



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 7, 2013

THOMAS W. HILTACHK, TREASURER
SPIRIT OF DEMOCRACY AMERICA
455 CAPITOL MALL, SUITE 600
SACRAMENTO, CA 95814

Response Due Date

04/11/2013

IDENTIFICATION NUMBER: C00521211

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -
11/26/2012), RECEIVED 01/30/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 7 item(s):

1. Your amended report discloses an increase in debts totaling \$40,582.03 on Line(s) 10 of the Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Your amended report discloses a decrease in disbursements totaling \$22,000 on Line(s) 24 of the Detailed Summary Page from those disclosed on your original report. Please amend your report(s) or provide an explanation for the apparent discrepancy. (11 CFR § 104.3)
3. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of Abel Maldonado and Paul Cook during this reporting period. However, a Schedule D supporting Line 10 has not been provided. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy. (11 CFR §104.4)